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8
UNITED STATES DISTRICT COURT
 9
DISTRICT OF NEVADA

10 RONALD OTIS BOYD II, an individual;

CASE NO.: 2:23-cv-02092-APG-VCF

11 Plaintiff,

12 vs.
STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES AND AMEND CURRENT
DISCOVERY PLAN AND SCHEDULING
ORDER [ECF No. 20].

13 MB PROSOUND AND STAGING, INC., a
 14 Foreign Corporation; DOE DEFENDANTS I
 – XX, inclusive; DOE MB PROSOUND
 15 EMPLOYEES I – XX; and ROE
 CORPORATIONS I – XX, inclusive,

16 Defendants.

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18 The parties hereby stipulate and agree, subject to this Court's approval, to extend the current
 19 discovery deadlines and amend the Discovery Plan and Scheduling Order (ECF No. 20) by ninety
 20 (90) days. This is the third request to extend the discovery deadlines in this matter. The parties are
 21 in agreement that the requested extension is in the interest of all parties to allow the parties to
 22 efficiently litigate this case. The parties submit that this extension is sought in good faith and will
 23 not unduly delay these proceedings.

24 **I. Discovery Completed to Date**

- 25 1. Plaintiff served his initial disclosures on January 26, 2024.
 26 2. Defendant served its initial disclosure on January 24, 2024.
 27 3. On February 13, 2024, Plaintiff served his first supplemental disclosure.

- 1 4. Defendant served Plaintiff with record authorizations to be signed and returned on
2 February 16, 2024. Plaintiff provided authorizations on March 19, 2024.
3 5. On February 23, 2024, Plaintiff served a Subpoena Duces Tecum to ESPN Productions,
4 Inc. for video footage of the incident.
5 6. On March 22, 2024, Plaintiff responded to written discovery requests served by
6 Defendant.
7 7. On March 22, 2024, Plaintiff served his second supplemental disclosure.
8 8. On April 10, 2024, Defendant responded to written discovery request served by
9 Plaintiff.
10 9. On April 12, 2024, Defendant conducted Plaintiff's deposition.
11 10. On April 23, 2024, Defendant served its first supplemental disclosure.
12 11. On May 9, 2024, Defendant served its second supplemental disclosure.
13 12. On May 22, 2024, Defendant served its third supplemental disclosure.
14 13. On May 23, 2024, Defendant served its fourth supplemental disclosure.
15 14. On June 3, 2024, Defendant served its fifth supplemental disclosure.
16 15. On June 14, 2024, Plaintiff served his third supplemental disclosure.
17 16. On June 17, 2024, Defendant served its sixth supplemental disclosure.
18 17. On July 24, 2024, Defendant issued a subpoena duces tecum to Don Nobis Progressive
19 Physical Therapy.
20 18. On July 30, 2024, Defendant served its seventh supplemental disclosure.
21 19. On August 27, 2024, Plaintiff served his fourth supplemental disclosure.
22 20. On September 9, 2024, Plaintiff disclosed his expert witnesses.
23 21. On September 9, 2024, Defendant disclosed its expert witnesses.
24 22. On October 3, 2024, Plaintiff took the deposition of Jim Cutshall.
25 23. On October 9, 2024, Plaintiff took the deposition of Robert Martinez, Jr.
26 24. The parties are preparing a stipulation regarding liability.

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1 **II. Discovery Left to Be Completed**

- 2 1. Expert depositions.
 3 2. Other percipient witnesses as needed.

4 **III. Reasons for Requested Extension**

5 The parties are working together amicably to complete the necessary discovery in this case.
 6 They are in the process of scheduling a private mediation. Given the nature and anticipated expense
 7 of the discovery remaining to be completed, the parties wish to complete mediation prior to
 8 incurring the cost and burden of expert depositions. This is the parties' third extension of deadlines.

9 **IV. Current and Proposed Deadlines**

	Current	Proposed
Amend Pleadings/Add Parties	September 9, 2024	No change
Initial Expert Disclosures	September 9, 2024	No change
Rebuttal Expert Disclosures	November 15, 2024	No change
Close of Discovery	February 4, 2025	May 5, 2025
Dispositive Motions	March 7, 2025	June 5, 2025
Joint Pretrial Order ¹	April 8, 2025	July 7, 2025

26 ¹ In the event a dispositive motion is timely filed, the date for filing the joint pre-trial order shall be suspended
 27 until thirty (30) days after the Court enters a ruling on the dispositive motion, or otherwise by further Court
 28 order.

1 Accordingly, the parties respectfully request that the Court enter an order approving the
2 proposed discovery schedule as set forth above. This request is made in good faith and will not
3 cause undue delay.

4 DATED February 3, 2025.

5 **MAINOR ELLIS, LLP**

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7 /s/Adam Ellis
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DATED February 3, 2025.

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13 **IT IS SO ORDERED.**

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UNITED STATES MAGISTRATE JUDGE
2-3-25